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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO/OAKLAND
DIVISION

JANE ROE, an individual; MARY ROE,
an individual; SUSAN ROE, an
individual; JOHN ROE, an individual;
BARBARA ROE, an individual;
PHOENIX HOTEL SF, LLC, a
California limited liability company;
FUNKY FUN, LLC, a California limited
liability company; and 2930 EL
CAMINO, LLC, a California limited
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-JST

**DECLARATION OF ASHCON
MINOIEFAR IN SUPPORT OF
PLAINTIFFS' STATEMENT TO
CONSIDER WHETHER
PLAINTIFFS' MATERIAL SHOULD
BE SEALED**

**ASSIGNED FOR ALL PURPOSES
TO THE HONORABLE DISTRICT
JUDGE JON S. TIGAR,
COURTROOM 6**

Action Filed: 03/14/2024
Trial Date: Unassigned

I, Ashcon Minoiefar, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an associate with Walkup, Melodia, Kelly & Schoenberger, attorneys of record for ALL PLAINTIFFS. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto. I make this declaration based in support of Plaintiffs' Statement in Support of Whether Plaintiffs' Deposition Transcripts and Related Exhibits Should Be Sealed.

2. Below is a table of the portions of Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction sought to remain under seal:

DOCUMENT	PORTION TO BE FILED UNDER SEAL	ORDER
Exhibit 1 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Jane Roe.	Family member's identifying information on page 27, lines 3 through 5.	
Exhibit 1 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Jane Roe.	Identifying information relating to the address of Jane Roe on page 106, lines 12 through 20.	
Exhibit 1 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Jane Roe.	Identifying information relating to the address of Jane Roe on page 117, lines 14 through 16.	
Exhibit 1 to the Declaration of Abigail Wald	Identifying information relating to the address of	

1	in Support of Defendant	Jane Roe on page 138 lines	
2	City and County of San	1 through 2.	
3	Francisco's Opposition to		
4	Plaintiffs' Motion for		
5	Preliminary Injunction		
6	Filed Under Seal,		
7	Deposition of Jane Roe.		
8	Exhibit 1 to the	Identifying information	
9	Declaration of Abigail Wald	relating to the address of	
10	in Support of Defendant	Jane Roe on page 143 lines	
11	City and County of San	4 through 12.	
12	Francisco's Opposition to		
13	Plaintiffs' Motion for		
14	Preliminary Injunction		
15	Filed Under Seal,		
16	Deposition of Jane Roe.		
17	Exhibit 2 to the	The entire photograph of	
18	Declaration of Abigail Wald	Jane Roe's residence and	
19	in Support of Defendant	address.	
20	City and County of San		
21	Francisco's Opposition to		
22	Plaintiffs' Motion for		
23	Preliminary Injunction		
24	Filed Under Seal.		
25	Exhibit 3 to the	The entire photograph of	
26	Declaration of Abigail Wald	the area surrounding Jane	
27	in Support of Defendant	Roe's residence and	
28	City and County of San	address.	
	Francisco's Opposition to		
	Plaintiffs' Motion for		
	Preliminary Injunction		
	Filed Under Seal.		
	Exhibit 4 to the	The entire photograph of	
	Declaration of Abigail Wald	the area surrounding Jane	
	in Support of Defendant	Roe's residence and	
	City and County of San	address.	
	Francisco's Opposition to		
	Plaintiffs' Motion for		
	Preliminary Injunction		
	Filed Under Seal.		
	Exhibit 5 to the	The entire photograph of	
	Declaration of Abigail Wald	Jane Roe's residence and	
	in Support of Defendant	address.	
	City and County of San		
	Francisco's Opposition to		
	Plaintiffs' Motion for		

1	Preliminary Injunction Filed Under Seal.		
2	Exhibit 6 to the	The entire photograph of	
3	Declaration of Abigail Wald	the area surrounding Jane	
4	in Support of Defendant	Roe's residence and	
5	City and County of San	address.	
6	Francisco's Opposition to		
7	Plaintiffs' Motion for		
8	Preliminary Injunction		
9	Filed Under Seal.		
10	Exhibit 7 to the	The entire photograph of	
11	Declaration of Abigail Wald	the area surrounding Jane	
12	in Support of Defendant	Roe's residence and	
13	City and County of San	address.	
14	Francisco's Opposition to		
15	Plaintiffs' Motion for		
16	Preliminary Injunction		
17	Filed Under Seal.		
18	Exhibit 8 to the	The entire photograph of	
19	Declaration of Abigail Wald	the area surrounding Jane	
20	in Support of Defendant	Roe's residence and	
21	City and County of San	address.	
22	Francisco's Opposition to		
23	Plaintiffs' Motion for		
24	Preliminary Injunction		
25	Filed Under Seal.		
26	Exhibit 9 to the	The entire photograph of	
27	Declaration of Abigail Wald	the area surrounding Jane	
28	in Support of Defendant	Roe's residence and	
	City and County of San	address.	
	Francisco's Opposition to		
	Plaintiffs' Motion for		
	Preliminary Injunction		
	Filed Under Seal.		
	Exhibit 10 to the	The entire photograph of	
	Declaration of Abigail Wald	the area surrounding Jane	
	in Support of Defendant	Roe's residence and	
	City and County of San	address.	
	Francisco's Opposition to		
	Plaintiffs' Motion for		
	Preliminary Injunction		
	Filed Under Seal.		
	Exhibit 11 to the	Identifying information	
	Declaration of Abigail Wald	relating to the address of	
	in Support of Defendant	John Roe on page 69 lines	
	City and County of San	4, 8, 13, 17, and 22.	

1	Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.		
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4	Exhibit 11 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 88 line 19, page 89 lines 1-5, 9, 17 and 21.	
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10	Exhibit 11 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 118 lines 2, 6-7, 9, 16, and 24.	
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15	Exhibit 11 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 129 line 4.	
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20	Exhibit 11 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 130 lines 2 and 24.	
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26	Exhibit 11 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to	Identifying information relating to the address of John Roe on page 156 line 15..	
27			
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1	Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.		
2			
3	Exhibit 11 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 158 line 1.	
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9	Exhibit 11 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of John Roe.	Identifying information relating to the address of John Roe on page 159 line 8.	
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14	Exhibit 12 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal.	All four photographs in their entirety of John Roe's residence and address.	
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19	Exhibit 14 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction Filed Under Seal, Deposition of Barbara Roe.	The identifying information of Barbara Roe on page 32 lines 9 through 10.	
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24	Exhibit 14 to the Declaration of Abigail Wald in Support of Defendant City and County of San Francisco's Opposition to Plaintiffs' Motion for Preliminary Injunction	The addresses of Barbara Roe on page 32 line 25.	
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1	Filed Under Seal, Deposition of Barbara Roe.		
2	Exhibit 15 to the	The entire photograph of	
3	Declaration of Abigail Wald	Barbara Roe's residence	
4	in Support of Defendant	and address.	
5	City and County of San		
6	Francisco's Opposition to		
7	Plaintiffs' Motion for		
8	Preliminary Injunction		
9	Filed Under Seal.		
10	Exhibit 16 to the	The entire photograph of	
11	Declaration of Abigail Wald	Barbara Roe's residence	
12	in Support of Defendant	and address.	
13	City and County of San		
14	Francisco's Opposition to		
15	Plaintiffs' Motion for		
16	Preliminary Injunction		
17	Filed Under Seal.		
18	Exhibit 17 to the	The entire photograph of	
19	Declaration of Abigail Wald	Barbara Roe's residence	
20	in Support of Defendant	and address.	
21	City and County of San		
22	Francisco's Opposition to		
23	Plaintiffs' Motion for		
24	Preliminary Injunction		
25	Filed Under Seal.		
26	Exhibit 18 to the	The entire photograph of	
27	Declaration of Abigail Wald	Barbara Roe's residence	
28	in Support of Defendant	and address.	
	City and County of San		
	Francisco's Opposition to		
	Plaintiffs' Motion for		
	Preliminary Injunction		
	Filed Under Seal.		
	Exhibit 19 to the	The entire photograph of	
	Declaration of Abigail Wald	Barbara Roe's residence	
	in Support of Defendant	and address.	
	City and County of San		
	Francisco's Opposition to		
	Plaintiffs' Motion for		
	Preliminary Injunction		
	Filed Under Seal.		
	Exhibit 22 to the	The address of Mary Roe on	
	Declaration of Abigail Wald	page 62 lines 2 through 6.	
	in Support of Defendant		
	City and County of San		

1	Francisco's Opposition to		
2	Plaintiffs' Motion for		
3	Preliminary Injunction		
4	Filed Under Seal,		
5	Deposition of Mary Roe.		
6	Exhibit 23 to the	The entire photograph of	
7	Declaration of Abigail Wald	Mary Roe's residence and	
8	in Support of Defendant	address.	
9	City and County of San		
10	Francisco's Opposition to		
11	Plaintiffs' Motion for		
12	Preliminary Injunction		
13	Filed Under Seal.		
14	Exhibit 24 to the	The entire photograph of	
15	Declaration of Abigail Wald	Mary Roe's residence and	
16	in Support of Defendant	address.	
17	City and County of San		
18	Francisco's Opposition to		
19	Plaintiffs' Motion for		
20	Preliminary Injunction		
21	Filed Under Seal.		
22	Exhibit 25 to the	The entire photograph of	
23	Declaration of Abigail Wald	Mary Roe's residence and	
24	in Support of Defendant	address.	
25	City and County of San		
26	Francisco's Opposition to		
27	Plaintiffs' Motion for		
28	Preliminary Injunction		
	Filed Under Seal.		
	Exhibit 26 to the	The entire photograph of	
	Declaration of Abigail Wald	Mary Roe's residence and	
	in Support of Defendant	address.	
	City and County of San		
	Francisco's Opposition to		
	Plaintiffs' Motion for		
	Preliminary Injunction		
	Filed Under Seal.		

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

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Executed on this 29th day of September, 2025, at San Francisco, California.



Ashcon Minoiefar

PROOF OF SERVICE

**Jane Roe, et al. v. City and County of San Francisco, et al.
USDC-Northern California Case No. 4:24-cv-01562-JST**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the county where the mailing took place, My business address is 650 California Street, 26th Floor, City and County of San Francisco, CA 94108-2615.

On the date set forth below, I caused to be served true copies of the following document(s) described as

**DECLARATION OF ASHCON MINOIEFAR IN SUPPORT OF PLAINTIFFS'
STATEMENT TO CONSIDER WHETHER PLAINTIFFS' MATERIAL
SHOULD BE SEALED**

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1
2 **BY ELECTRONIC TRANSMISSION:** Pursuant to CCP 1010.6(e), I caused
3 the above-titled document(s) to be electronically served on the persons at the
4 electronic service addresses listed.

5 I declare under penalty of perjury under the laws of the United States of
6 America that the foregoing is true and correct and that I am employed in the office of
7 a member of the bar of this Court at whose direction the service was made.

8 Executed on September 29, 2025, at San Francisco, California.

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Kirsten Benzien